

To: Wauters, Patrick[wauters.patrick@epa.gov]
From: Fallon, Gail
Sent: Mon 2/27/2017 5:32:02 PM
Subject: RE: Naughton 3 (and Dave Johnston)
[78 FR 34738 6-10-13.pdf](#)
[79 FR 5032 WY RH Final Rule 1-30-14.pdf](#)
[AR Index CourtLink Document US-APP-CA10 14-9534 Idx 1015067 5 8 2014 085325521.pdf](#)

Hi Patrick – Monica actually wants to know about SO2 controls for all the units at the plant, not just Unit 3. And the same thing for Dave Johnston (all the units, not just Units 1 and 2). I gave Aaron a heads up that you might need help and he is at a point with his project that he has time so feel free to ask him for help.

He suggested you might want to look at the BART (best available retrofit technology) determinations (or BART “applications”) in the regional haze plan. He remembers that WY actually did this for SO2 even though they ultimately relied on the backstop trading program approach. The state may have regional haze documents on its website but you could also look at our EPA regional haze action and the docket for that. I attached our proposed and final rules which probably don’t mention SO2. The information you want would probably be in the state’s submittal document which you could find by looking in the docket for our action at:

<https://www.regulations.gov/docket?D=EPA-R08-OAR-2012-0026>

I’ve attached the index we filed with the court because we were sued on this action which is a handy roadmap for the docket. We also have all the docket documents copied in an I: drive folder but I think you would need to ask Jaslyn for access to that.

Thanks,

Gail

From: Fallon, Gail
Sent: Friday, February 24, 2017 5:32 PM

To: Wauters, Patrick <wauters.patrick@epa.gov>
Subject: Naughton 3

Hi Patrick,

Monica is also asking if we can check on existing SO2 controls for PacifiCorp's Naughton Unit 3 and if a project to convert this unit to natural gas is enforceable via some permitting action (it appears the project is scheduled for 2019). I know this and the Dave Johnston question are WY issues but we thought maybe you could help out. You might just ask DJ if he knows about the gas conversion off the top of his head and get some tips from him about where to look. I checked the State's website and found a Naughton title V permit from 2008 (expired 2013) but think that one would be too old to show the gas conversion (the document is not searchable so I didn't take too much time looking at it.) I suppose we could check permits for SO2 controls as well if the Air Markets Division website doesn't provide clear info.

Monica is asking about this to gain some insight about and support the SO2 designation project that Adam is working on but as you know, he's been out.

Thanks,

Gail